



January 17, 2012

Marlene H. Dortch,
Secretary Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Standardized and Enhanced Disclosure Requirements for Television Broadcast
Licensee Public Interest Obligations, MB Dkt. 00-168**

To the FCC:

Public accountability – a critical component to the level of trust and sense of efficacy that Americans have in our democracy – can be either helped or hindered by new media innovations. Technology can be used to overwhelm and obfuscate, or it can be used to organize and illuminate. The FCC's proposed rule requiring television broadcasters to make available online existing information about political advertisements as well as paid advocacy that is disguised as news reports can show the country that we believe information cannot be truly public without being as broadly accessible as possible, and that accountability must come with context. The FCC should require not only that television broadcasters' public files be online, but that they be in an open and well-structured data format.

Merely requiring that the public files be available online still allows broadcasters and public policy advocates the ability to conceal useful information from the public by posting documents in PDF or another unstructured file format. This may save interested citizens the gas money of driving to the station, but it doesn't allow them to easily see the context of an individual ad buy. For this country to retain an open democracy, it is vital that the FCC set reasonable guidelines to ensure that the standards of "transparency" continue to serve the people this directive was designed to serve.

As an Assistant Professor with a decade of experience in online newsrooms, I recognize that journalists, in particular, are interested in finding patterns and using those patterns to provide context to citizens. Last year, I began a project called OpenBlock Rural, which is designed to lower the cost for rural news organizations to acquire, analyze and publish public records on their websites. The \$250,000 project is funded by a News Challenge grant from the John S. & James L. Knight Foundation. I've seen firsthand how much it costs for news organizations to transform poorly formatted digital data into something usable for the public, and I've spoken with vendors and government agencies about the systems they use that can easily produce well-structured data if there is public demand for it.

The most common place that most Americans get their information about candidates and elections is through paid political television. Such stories are more complete and useful when they have context such as the frequency and averages of ad buys. From my own experience,

I know a journalist dealing with online PDFs of a political file would need to download each file, re-type each field of data into a spreadsheet or database before even beginning to analyze the data for patterns. Tools such as optical character recognition software that attempt to pull text out of PDF images are expensive and require rigorous human error checking. If the FCC does want to promote transparency in broadcasting, then it is essential that they not only require, but make expedient, necessary information for the watchdog component of our democracy.

Ironically, at a time when news organizations are struggling to find a viable business model for public affairs reporting, the FCC has an opportunity to reduce the costs of that reporting without adding to the cost of doing business for broadcasters. In fact, many of the reporters who would take advantage of the cost savings associated with well-structured data formats are employed by television broadcasting companies who make money by trading on the public trust of their local news programming.

A data-centric view rather than a document-centric one will have positive cost benefits to news organizations, political campaigns and broadcasters themselves. Television broadcasters must now disclose to anyone who visits their stations – whether the visitor has an appointment or not – a limited set of data about political television advertising. That data is now only required to be available on paper, and it is printed on the paper either by human hand or by computer. Requiring the data in well-structured format such as a comma-delimited file format (.csv) or via an Internet-accessible feed formatted in extensible markup language (XML) may reduce recurring effort of filing this data that is already required by the FCC. It certainly will not increase the recurring effort – it will still be either entered by hand or generated automatically by a computer.

Broadcasters will not bear much, if any, one-time transition costs with the new online transparency requirements. Vendors who provide software to the broadcast industry already tout their products as integrating sales information as well as broadcast content trafficking and scheduling. Whether outsourced or homebuilt, the software that manages sales and ad delivery already rests upon well-structured databases against which can be written a query for data and a template in which that data should be displayed. That query is written once, that template is written once and the public benefit persists. Even if this were not true, broadcasters would still require nothing more than someone to enter the data into a Web form or spreadsheet – a task no more onerous than handwriting the data on paper.

If the FCC does not produce current, comprehensive, machine-readable and well-structured data on its website, then the only place that this is likely to take place would be inside national political parties and campaigns. Political campaigns already mobilize a cadre of volunteers who regularly visit television stations in every market each election cycle to obtain paper copies of the political ad buys. Unlike citizens and most news organizations, campaigns will continue to construct their own databases because it helps their operation run more efficiently. And they will continue to have available to them volunteers who wish to sway the public debate in one way or another.

Swaying the public debate and making money are cornerstones of the American economic and political system. But this is an opportunity to increase public understanding of how those systems work. Certainly, broadcasters' public files should be accessible on the Internet. But

that is merely a half-measure to truly serving the information needs of all American communities.

As a member of the first generation of journalists who've been able to take advantage of data to improve the accuracy and transparency of our reporting, I have struggled mightily to help truly open government records in digital format throughout rural communities. And as a teacher of aspiring journalists and young citizens, I can think of no greater tool than improved understanding free from the limitations and burdens borne by earlier generations. And I can think of no better time – no more efficient time – to establish that we are willing to always adapt to the best technology that favors the full promise of accountability and transparency.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R Thornburg', with a stylized flourish at the end.

Ryan Thornburg
Director, OpenBlock Rural and Assistant Professor
School of Journalism and Mass Communication
The University of North Carolina at Chapel Hill